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ROBERT HUNTER BIDEN

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ROBERT HUNTER BIDEN, an
individual,

Plaintiff,

vs.

PATRICK M. BYRNE, an individual,

Defendant.

Case No. 2:23-cv-09430-SVW-PD

**DECLARATION OF ZACHARY C.
HANSEN IN SUPPORT OF
SUPPLEMENT TO PLAINTIFF'S
OPPOSITION TO DEFENDANT
PATRICK M. BYRNE'S MOTION
FOR SUMMARY JUDGMENT**

*[Plaintiff's Supplement To His
Opposition To Defendant Patrick M.
Byrne's Motion For Summary
Judgment; and Additional Separate
Statement Of Controverted Facts filed
and served concurrently herewith]*

Date: July 21, 2025
Time: 1:30 P.M.
Crtrm.: 10A

Judge: Hon. Stephen V. Wilson

DECLARATION OF ZACHARY C. HANSEN

I, Zachary C. Hansen, declare and state as follows:

1. I am an Attorney within the law firm of Early Sullivan Wright Gizer & McRae LLP, attorneys of record for Plaintiff Robert Hunter Biden (“Plaintiff”) herein. I submit this declaration in support of Plaintiff’s Supplement To His Opposition To Defendant Patrick M. Byrne’s Motion For Summary Judgment. If called as a witness, I would and could testify to the matters contained herein.

2. True and correct copies of relevant portions of the transcript of the February 24, 2025 Final Pre-trial Conference in this case are attached hereto as **Exhibit “A”**.

3. True and correct copies of relevant portions of Defendant’s deposition testimony from February 4, 2025, are attached hereto as **Exhibit “B”**.

4. True and correct copies of relevant portions of Special Agent David Smith’s deposition testimony from April 21, 2025, are attached hereto as **Exhibit “C”**.

5. True and correct copies of relevant portions of John Moynihan’s deposition testimony from February 14, 2025, are attached hereto as **Exhibit “D”**.

6. True and correct copies of relevant portions of Defendant’s deposition testimony from December 14, 2024, are attached hereto as **Exhibit “E”**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 20th day of May, 2025, at Summit, New Jersey.

/s/ Zachary C. Hansen
Zachary C. Hansen

CERTIFICATE OF SERVICE

I, Robie Ann Atienza-Jones, hereby certify that on this 20th day of May, 2025, a copy of the foregoing **DECLARATION OF ZACHARY C. HANSEN IN SUPPORT OF SUPPLEMENT TO PLAINTIFF'S OPPOSITION TO DEFENDANT PATRICK M. BYRNE'S MOTION FOR SUMMARY JUDGMENT** was served via email or by certified mail, as indicated, on the following:

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